

# Wallops Flight Facility

Implementation of the

## OSHA Voluntary Protection Program (VPP)



# Agenda

This briefing covers the following areas:

- Background info on OSHA and VPP
- Why are we implementing this program?
- Hierarchy of requirements
  - OSHA, Federal Agencies, NASA, VPP
- Process for VPP Certification
- Where are we now
- What is next



# What is OSHA and VPP?

- OSHA was established in 1970 under the Department of Labor
  - Federal Government employees and facilities were exempt (military industrial complex issues)
- Federal Government came under OSHA in 1980 (29CFR1960)
  - Federal workers are covered by their agencies. By Presidential Executive Order, federal agencies must maintain an effective safety and health program that meets the same standard as private employers. But federal agencies cannot be fined for violating health and safety standards.
- VPP Program was implemented by OSHA in 1982
  - Most VPP requirements are implemented for Federal agencies in 29CFR1960
  - Federal agencies allowed to participate in 1998
  - NASA has several VPP certified field centers. JSC, LaRC, KSC, ARC and IV&V are complete. SSC expects to be complete by 2011. GSFC, GRC, DFRC and MSFC are pursuing some safety management program. HQ is currently not participating.



# What is VPP?

- The Voluntary Protection Program (VPP) promotes effective worksite-based safety and health. In the VPP, management, labor, and OSHA establish cooperative relationships at workplaces that have implemented a comprehensive safety and health management system. Approval into VPP is OSHA's official recognition of the outstanding efforts of employers and employees who have achieved exemplary occupational safety and health.



# What VPP is NOT

- It is not a passing fad- established and growing for 28 years.
- It is not an ISO program that focuses on following a prescribed documentation scheme- it is “results oriented”.
- It does not mandate additional OSHA safety requirements- it requires a higher level of implementation and management of the OSHA safety requirements, with proof of employee involvement within the safety processes.

# Why are we changing the Safety Program?

- We need to continually improve the program to reduce mishaps and provide a safe work environment
- Our current program is a result of some VPP processes that have been partially implemented and contains many poorly documented requirements
- We need to involve employees- they are the ones getting injured, and usually have good ideas for improvement of the safety program
- In 2006 NASA HQ mandated in NPR 8715.3 that a formal, independently recognized Safety Management Program be implemented at each field center by 2008

# Possible Safety Program Management Systems- Why we chose VPP

- ISO 18001
  - Pro- Recognized Worldwide. Used by some companies in the US, mostly those with international ties.
  - Con- Cost to certify and maintain certification. Focuses on process, not on results. Does not include employee involvement.
- VPP
  - Pro- Free to certify. Employee involvement, based on existing requirements, experience within the agency. Some basic processes are already in place such as councils and Work Center Safety Guide.
  - Con- Requires a program restructuring, and a lot of documentation updates and training. Program will take at least two years to create and implement.
- Dupont Safety Program
  - Pro- Based on industrial processes and work environments.
  - Con- Not a certified program, but could be implemented. Requires paid consultants to get and maintain.
- STAR Consultants
  - Pro- Attempted in 2004, some experience. Currently considered by MSFC but not implemented.
  - Con- Not a certified program, but could be implemented. Requires paid consultants to get and maintain.

# Hierarchy of Requirements



OSHA laws that apply to everyone. Those that primarily affect WFF refer to industrial safety, construction safety and worker injury/illness that we have to record and report to OSHA. We have no choice in the application or the affect of these rules, there are no exceptions for federal agencies.

# Hierarchy of Requirements



Federal Agency requirements are applied by 29CFR1960. This requires each agency to develop a plan to protect their employees. It mandates many more specific items than apply to general industry such as supervisor training and creation of councils. It also allows agencies to create Supplemental and Alternate Standards when OSHA standards do not meet agency requirements. NASA standards for lifting and explosives are such standards. These standards now carry the weight of an OSHA Standard and DOL must approve any waivers.

# Hierarchy of Requirements



The NASA program is established by NPDs, NPRs and NASA Standards and the agency requirements are carried out at GSFC via GPDs, GPRs and Work Instructions. These state how we carry out the OSHA minimum requirements plus our own agency requirements. No lower level document can rescind an upper level requirement. There is a formal waiver process to waive an agency requirement. Many NASA Standards exceed OSHA requirements.

# Hierarchy of Requirements



VPP is a management program that was designed to bring up the standards in general industry by encouraging employers to voluntarily raise safety standards and include employees in the process of creating and maintaining an active safety program. It focuses on management commitment and employee involvement, workplace analysis, hazard identification and training.

# What is the Process to get VPP Certified?

- Management commits to operating an effective occupational safety and health management system characterized by four basic elements: management leadership and employee involvement, worksite analysis, hazard prevention and control, and safety and health training.
- Employees agree to participate in the program and work with management to ensure a safe and healthful workplace.
- The site submits an application to OSHA that describes its system of worker protection.
- OSHA evaluates the application. If OSHA accepts it, the agency then conducts an onsite review to verify that the safety and health management system meets VPP requirements. With approval comes OSHA's public recognition of the applicant's exemplary safety and health management system.
- OSHA also periodically reevaluates the participant to confirm its continuing qualification for VPP.
- OSHA removes VPP participants from its programmed inspection lists.
- OSHA enforcement personnel will investigate workplace complaints, any fatality or catastrophe, and other significant events. After such events, VPP personnel may also review a participant's continuing eligibility for VPP.

# Are we pursuing VPP Certification?

Not at this time. The intent is to improve the current program by implementing the VPP management model. Once we improve our system to a level we like, we could decide to pursue an official certification at a later date. Prior to application for OSHA certification a program must be successful and in place at least one year prior to submission. We need to focus on getting a better program in place, not getting a certification. It will take approximately two years to get a program in place. With the current workload, possibly longer.

# Where are we now?

- Met with OSHA Regional Office to discuss our working relationship last summer.
- We completed several assessments of our program last year. This resulted in multiple findings in all areas assessed.
- Created and implemented a plan to begin corrective actions required in major areas of deficiencies.
- Working with GSFC committee to implement a VPP compliant program across all locations.
- Created a VPP Steering Committee to provide feedback on how the process is working.

# What is next?

- All personnel will be exposed to the overall approach to this change during the SAC.
- VPP Regional Conference is in Pittsburg, PA in April. Please attend if possible.
- Will begin a major GPR update this summer for the WFF Safety Program.
- Identifying new training requirements and methods. (SATERN)
- Creating new local Website to streamline information.
- Implementing new feedback processes for Close Calls, Safety Concerns and Safety Suggestions.

# Questions?

This presentation is posted on the Code 803.2 website under the VPP Documentation tab.

Contact Code 803.2 for further info.

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# WFF Manager and Supervisor VPP Orientation Briefing

Please check the session you are attending and sign the roster.

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